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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. JORDAN ARNOLD (1), CHRISTOPHER BLACK (2), JESSICA KING (3), Defendants.	Criminal Case No. 08CR0274-LAB I N D I C T M E N T **(Superseding)** Title 18, U.S.C., Secs. 1591(a)(1), (a)(2) and (b)(2) - Sex Trafficking of Children; Title 18, U.S.C., Sec. 2422(b) - Coercion and Enticement of Juvenile into Prostitution; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 18, U.S.C., Sec. 371 - Conspiracy

The grand jury charges:

Count 1

CONSPIRACY TO ENGAGE IN SEX TRAFFICKING OF CHILDREN

[18 U.S.C. § 371]

OBJECT OF THE CONSPIRACY

1. From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, and elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting interstate commerce, did knowingly conspire and agree with each other, and other persons known and unknown to the grand jury, to knowingly recruit, entice, harbor, transport, provide,

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and obtain by any means juveniles, and did benefit financially and by receiving a thing of value, from participation in a venture engaged in such acts, knowing that the juvenile had not attained the age of 18 years and would be caused to engage in commercial sex acts; in violation of Title 18, United States Code, Section 1591.

METHODS AND MEANS

2. From on or about a date unknown, but no later than August 1, 2007, to and including October 11, 2007, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING recruited, persuaded, and transported juvenile females to perform acts of prostitution (exchange of sex acts for money) for the defendants' financial benefit.

3. The individuals hereinafter referred to as "the juveniles" include females identified as A. A., L. A., H. C., and K. W.

4. Defendants ARNOLD and BLACK recruited and enticed the juveniles to perform acts of prostitution, the proceeds from which the defendants intended to, and did, receive and keep.

5. Defendants ARNOLD, BLACK and KING instructed the juveniles how to solicit prostitution customers ("johns") for acts of prostitution ("dates"), including how to dress, how to pose for photographs used in internet ads soliciting "dates," what language to put in internet ads soliciting "dates," how to post internet ads soliciting "dates," what language to use on the telephone or in person to solicit "dates," how to perform sex acts, and how much money to charge in exchange for the performance of particular sex acts.

6. Defendants ARNOLD, BLACK and KING took digital photographs of the juveniles, as the juveniles wore lingerie and posed provocatively, which were subsequently saved onto computers and

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uploaded onto the internet and the Craigslist website to create ads soliciting "johns."

7. Defendants ARNOLD, BLACK, and KING posted, or instructed the juveniles to post, ads onto the Craigslist website to solicit "johns."

8. Defendants ARNOLD and BLACK provided telephones for the juveniles to receive calls from customers responding to Craigslist ads soliciting "johns," and for the juveniles to contact one of the defendants to pick up the juveniles from a hotel or elsewhere after completion of a date.

9. Defendants ARNOLD, BLACK and KING drove the juveniles to hotels and other locations within the Southern District of California to perform sex acts with "johns" solicited through Craigslist ads, and picked up the juveniles from the same locations after sex acts had been completed.

10. Defendants ARNOLD and BLACK collected from the juveniles proceeds obtained by the juveniles in exchange for completed sex acts performed in response to Craigslist ads.

OVERT ACTS

11. In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators, known and unknown to the grand jury, committed and caused to be committed the following overt acts, among others, within the Southern District of California:

a. Between August 1, 2007 and August 15, 2007, Defendant ARNOLD recruited and enticed A. A. to work as a prostitute for his financial benefit.

b. Between August 15, 2007 and September 1, 2007, Defendant BLACK recruited and enticed L. A. to work as a prostitute for his financial benefit.

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c. Between August 15, 2007 and September 1, 2007, Defendant ARNOLD instructed Defendant KING to teach A. A. and L. A. how to solicit "johns" and how to perform sex acts as a prostitute.

d. Between August 15, 2007 and September 1, 2007, Defendant KING taught A. A. and L. A. how to solicit "johns" and how to perform sex acts as a prostitute.

e. Between August 15, 2007 and October 11, 2007, Defendant BLACK instructed L. A. that her picture and phone number would be on the internet and that she would receive calls soliciting sex as well as how much money to charge for acts of prostitution.

f. Between August 15, 2007 and September 1, 2007, Defendant KING used Defendant ARNOLD's mobile telephone to take photographs of A. A. and L. A. in lingerie and provocative poses for ads which would be posted on the Craigslist website to solicit "johns."

g. Between August 15, 2007 and September 15, 2007, Defendant BLACK took photographs of L. A. at his apartment, while she was in lingerie and provocative poses for an ad which would be posted on the Craigslist website to solicit "johns."

h. Between August 15, 2007 and October 11, 2007, Defendants ARNOLD and BLACK provided access to their computers to A. A. with instructions that A. A. was to post Craigslist ads depicting herself to solicit "johns."

i. Between August 15, 2007 and October 11, 2007, Defendant BLACK used his computer and other computers to post Craigslist ads depicting L. A. to solicit "johns" for L. A.

j. Between August 1, 2007 and October 11, 2007, Defendant ARNOLD gave a mobile telephone to A. A. to use to receive calls from

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"johns" in response to the Craigslist ads and to communicate with Defendant ARNOLD.

k. Between August 15, 2007 and October 11, 2007, Defendant BLACK gave a mobile telephone to L. A. to use to receive calls from "johns" in response to the Craigslist ads and to communicate with Defendant BLACK.

l. Between August 1, 2007 and October 11, 2007, Defendant ARNOLD directed A. A. to make arrangements by telephone to meet "johns" at various hotels in the Mission Valley or Sports Arena areas of San Diego.

m. Between August 1, 2007 and October 11, 2007, Defendants ARNOLD, BLACK and KING drove A. A. to hotels where they knew A. A. would perform acts of prostitution arranged in response to ads depicting her and posted on Craigslist.

n. Between August 15, 2007 and October 11, 2007, Defendants ARNOLD and BLACK drove L. A. to hotels where they knew L. A. would perform acts of prostitution arranged in response to ads depicting her and posted on Craigslist.

o. Between August 1, 2007 and October 11, 2007, Defendant ARNOLD picked up A. A. from various locations in San Diego after she had completed acts of prostitution.

p. Between August 15, 2007 and October 11, 2007, Defendant BLACK picked up L. A. from various locations in San Diego after she had completed acts of prostitution.

q. Between August 1, 2007 and October 11, 2007, Defendant ARNOLD collected from A. A. the proceeds she received in exchange for acts of prostitution.

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r. Between August 15, 2007 and October 11, 2007, Defendant BLACK collected from L. A. the proceeds she received in exchange for acts of prostitution.

s. On September 13, 2007, Defendant KING posted an ad depicting A. A. onto the Craigslist website to solicit "johns."

t. On or about September 14, 2007 and September 15, 2007, Defendant ARNOLD recruited and enticed H. C. and K. W. to work as prostitutes for his financial benefit.

u. On or about September 15, 2007, at a hotel in the Mission Valley area of San Diego, Defendant ARNOLD used the camera in his mobile telephone to take photographs of H. C. and K. W. while they were dressed in lingerie and in provocative poses, which were subsequently used in ads posted on Craigslist to solicit "johns."

v. On or about September 18, 2007, Defendant ARNOLD instructed A. A. to teach H. C. and K. W. how to post ads on Craiglist and how to solicit "dates" for prostitution.

w. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD instructed K. W. that he would break her jaw if she reported him to the police, talked back to Defendant ARNOLD, or did not do as he instructed her.

x. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD instructed H. C. to make arrangements by telephone to meet "johns" at various hotels in the Mission Valley or Sports Arena areas of San Diego, arranged in response to ads depicting her and posted on Craigslist.

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y. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD gave a mobile telephone to H.C. to use to receive calls from "johns" in response to the Craigslist ads, and to communicate with Defendant ARNOLD.

z. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD drove H.C. to hotels where he knew H. C. would perform acts of prostitution arranged in response to ads depicting her and posted on Craigslist.

aa. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD picked up H. C. from various locations in San Diego after H. C. completed acts of prostitution.

bb. Between September 14, 2007 and October 11, 2007, Defendant ARNOLD collected from H. C. the proceeds H. C. received in exchange for acts of prostitution.

cc. On October 6, 2007, Defendants ARNOLD and BLACK rented rooms at a hotel in the Mission Valley area of San Diego for use by A. A. and L. A. to perform acts of prostitution with "johns" solicited through Craigslist ads depicting A. A. and L. A., and posted on the same date.

dd. On October 7, 2007, Defendants ARNOLD and BLACK rented a room at a hotel in the Mission Valley area of San Diego for use by A. A., L. A. and H. C. to perform acts of prostitution with "johns" solicited through Craigslist ads depicting A. A., L. A. and H. C., and posted on the same date.

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ee. On October 11, 2007, Defendant ARNOLD drove H. C. to a hotel in the San Diego area to perform an act of prostitution with a date solicited through a Craigslist ad depicting H. C. and posted on the same date.

All in violation of Title 18, United States Code, Section 371.

Count 2

CONSPIRACY TO COERCE AND ENTICE JUVENILES INTO PROSTITUTION

[18 U.S.C. § 371]

OBJECT OF THE CONSPIRACY

12. From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, and elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, knowingly conspired and agreed with each other, and other persons known and unknown to the grand jury, to use the mail and any facility and means of interstate or foreign commerce, to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; in violation of Title 18, United States Code, Sections 2422(b).

METHODS AND MEANS

13. The Government incorporates by reference Paragraphs 2 through 10.

OVERT ACTS

14. The grand jury hereby repeats and realleges Paragraph 11 as fully set forth herein.

All in violation of Title 18, United States Code, Section 371.

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Count 3

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide and obtain by any means A. A., (a juvenile), and did benefit financially and by receiving a thing of value, from participation in a venture engaged in such acts, knowing that A. A. had not attained the age of 18 years and would be caused to engage in commercial sex acts; all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2), and 2.

Count 4

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely A. A., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Sections 2422(b) and 2.

Count 5

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide and obtain by any means L. A., (a juvenile), and did benefit financially and by receiving a thing of value, from

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participation in a venture engaged in such acts, knowing that L. A. had not attained the age of 18 years and would be caused to engage in commercial sex acts; all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2), and 2.

Count 6

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely L. A., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Sections 2422(b) and 2.

Count 7

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide and obtain by any means H. C., (a juvenile), and did benefit financially and by receiving a thing of value, from participation in a venture engaged in such acts, knowing that H. C. had not attained the age of 18 years and would be caused to engage in commercial sex acts; all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2).

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Count 8

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely H. C., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2422(b).

Count 9

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide and obtain by any means K. W., (a juvenile), and did benefit financially and by receiving a thing of value, from participation in a venture engaged in such acts, knowing that K. W. had not attained the age of 18 years and would be caused to engage in commercial sex acts; all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(2).

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Count 10

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely K. W., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2422(b).

DATED: May 23, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:
CHRISTOPHER P. TENORIO
Assistant U.S. Attorney